

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE:	§	(Chapter 7)
	§	
DZS INC.,¹	§	CASE NO. 25-40712
	§	
DEBTOR.	§	(Jointly Administered)

**TRUSTEE'S WITNESS AND EXHIBIT LIST
Hearing: April 28, 2025 at 1:30 PM (CT)**

COMES NOW Michelle H. Chow, Chapter 7 Trustee of the above-referenced cases (“Trustee”), by and through her counsel Singer & Levick, P.C, and files this *Trustee’s Witness and Exhibit List* in connection with the hearing scheduled for April 28, 2025 on *Trustee’s Motion for an Order Approving Sale of Certain Property of the Estate Free and Clear of all Liens, Claims and Encumbrances and Assumption and Assignment of Executory Contracts and Leases* (“Sale Motion”) (Dkt.026) and, for such, would respectfully show as follows.

WITNESSES

1. Michelle H. Chow, Chapter 7 Trustee
2. Charles Vogt
3. Clayton Zekelman
4. Any witness designated by any other party.

The Trustee reserves the right to call and/or use testimony offered into evidence by any other party. Additionally, the Trustee also reserves the right to offer into evidence such additional

¹ The Debtors in these Chapter 7 cases, along with the last four digits of each Debtor’s Federal Tax Identification Number, include: DZS Inc. (9099), DZS Services Inc. (3763) and DZS California Inc. (3221). The location of the Debtors’ service address is: 5700 Tennyson Parkway, Suite 400, Plano, TX 75024.

testimony as may be appropriate for rebuttal and/or impeachment purposes. Finally, the Trustee reserves the right to amend and/or supplement this Witness List to the extent necessary or appropriate.

EXHIBITS

EX. #	DESCRIPTION OF EXHIBIT	OFFERED	OBJECTED	ADMITTED
1	Letter of Intent			
2	Asset Purchase Agreement with Fibre Acquisition Corporation			
3	Schedules -- DZS Inc. (Dkt.002)			
4	Statement of Financial Affairs – DZS, Inc. (Dkt.003)			
5	Trustee's First Notice of Executory Contracts and Unexpired Leases That May Be Assumed and Assigned (Dkt.047)			
6	Trustee's Second Notice of Executory Contracts and Unexpired Leases That May Be Assumed and Assigned (Dkt.048)			
7	Trustee's Third Notice of Executory Contracts and Unexpired Leases That May Be Assumed and Assigned (Dkt.049)			
8	Trustee's Fourth Notice of Executory Contracts and Unexpired Leases That May Be Assumed and Assigned (Dkt.050)			
9	Trustee's Fifth Notice of Executory Contracts and Unexpired Leases That May Be Assumed and Assigned (Dkt.051)			
10	Trustee's Sixth Notice of Executory Contracts and Unexpired Leases That May Be Assumed and Assigned (Dkt.052)			
11	Trustee's Seventh Notice of Executory Contracts and Unexpired Leases That May Be Assumed and Assigned (Dkt.053)			

EX. #	DESCRIPTION OF EXHIBIT	OFFERED	OBJECTED	ADMITTED
12	Trustee's Eighth Notice of Executory Contracts and Unexpired Leases That May Be Assumed and Assigned (Dkt.054)			
13	Trustee's Ninth Notice of Executory Contracts and Unexpired Leases That May Be Assumed and Assigned (Dkt.055)			
14	Trustee's Tenth Notice of Executory Contracts and Unexpired Leases That May Be Assumed and Assigned (Dkt.056)			
15	Trustee's Eleventh Notice of Executory Contracts and Unexpired Leases That May Be Assumed and Assigned (Dkt.057)			
16	Trustee's Twelfth Notice of Executory Contracts and Unexpired Leases That May Be Assumed and Assigned (Dkt.058)			
17	Trustee's Thirteenth Notice of Executory Contracts and Unexpired Leases That May Be Assumed and Assigned (Dkt.059)			
18	Trustee's Fourteenth Notice of Executory Contracts and Unexpired Leases That May Be Assumed and Assigned (Dkt.060)			
19	Trustee's Fifteenth Notice of Executory Contracts and Unexpired Leases That May Be Assumed and Assigned (Dkt.061)			
20	Trustee's Sixteenth Notice of Executory Contracts and Unexpired Leases That May Be Assumed and Assigned (Dkt.062)			
21	Trustee's Seventeenth Notice of Executory Contracts and Unexpired Leases That May Be Assumed and Assigned (Dkt.063)			
22	Trustee's Eighteenth Notice of Executory Contracts and Unexpired Leases That May Be Assumed and Assigned (Dkt.064)			

EX. #	DESCRIPTION OF EXHIBIT	OFFERED	OBJECTED	ADMITTED
23	Trustee's Nineteenth Notice of Executory Contracts and Unexpired Leases That May Be Assumed and Assigned (Dkt.065)			
24	Trustee's Twentieth Notice of Executory Contracts and Unexpired Leases That May Be Assumed and Assigned (Dkt.066)			
25	Trustee's Twenty-First Notice of Executory Contracts and Unexpired Leases That May Be Assumed and Assigned (Dkt.069)			
26	Trustee's Twenty-Second Notice of Executory Contracts and Unexpired Leases That May Be Assumed and Assigned (Dkt.076)			
27	EdgeCo, LLC Proof of Claim (POC.006-1)			
28	Proposed Notice of Assumption of Executory Contract(s) or Unexpired Lease(s)			
29	Proposed Notice of Assignment of Avoidance Actions			
	All pleadings and court documents of record in the instant bankruptcy matter			
	Any exhibit designated by any other party			
	Any rebuttal and/or impeachment documents as appropriate			

The Trustee reserves the right to use any documents offered into evidence by any other party. Additionally, the Trustee reserves the right to offer into evidence such additional documents as may be appropriate for rebuttal and/or impeachment purposes. Finally, the Trustee reserves the right to amend and/or supplement this Exhibit List to the extent necessary or appropriate.

Dated: April 23, 2025

Respectfully submitted,

SINGER & LEVICK, P.C.

By: /s/ Michelle E. Shriro
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GENERAL COUNSEL FOR
MICHELLE H. CHOW, CHAPTER 7 TRUSTEE

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been electronically mailed to the parties that are registered or otherwise entitled to receive electronic notices in this case pursuant to the Electronic Filing Procedures in this District and LBR 9013(f), which includes the parties as shown below, on this 23rd day of April, 2025.

<u>DEBTOR:</u> DZS Inc. 5700 Tennyson Parkway, Suite 400 Plano, TX 75024 VIA ECF Noticing through its attorney	<u>ATTORNEY FOR DEBTOR:</u> Travis A. McRoberts Baker Botts L.L.P. 2001 Ross Avenue, Suite 900 Dallas, TX 75201-1980 VIA ECF Noticing
<u>COUNSEL FOR PURCHASER:</u> Deborah D. Williams Dykema 112 E. Pecan Street, Suite 1800 San Antonio, TX 78205 VIA ECF Noticing	<u>COUNSEL FOR FL LANDLORD:</u> Richard B. Warren Warren & Grant, P.A. 4800 N. Federal Highway, Suite A-205 Boca Raton, FL 33431 VIA EMAIL: <u>rick@warrengrant.com</u>
<u>COUNSEL FOR FUTUREWEI TECH.:</u> David M. Banker Womble Bond Dickinson (US) LLP 950 Third Avenue, Suite 2400 New York, NY 10022 VIA EMAIL: <u>david.banker@wbd-us.com</u>	<u>COUNSEL FOR PLANO LANDLORD:</u> James D. Sadowski Greenstein Delorme & Luchs, P.C. 801 17th Street, N.W., Suite 1000 Washington, D.C. 20006 VIA EMAIL: <u>jds@gdllaw.com</u>
<u>TRUSTEE:</u> Michelle H. Chow 16200 Addison Road, Suite 140 Addison, TX 75001 VIA ECF Noticing	<u>US TRUSTEE:</u> Office of the US Trustee 110 N. College Ave., Suite 300 Tyler, Texas 75702 VIA ECF Noticing

/s/ Michelle E. Shriro
Michelle E. Shriro